

# City of Cincinnati



Interdepartment  
Correspondence Sheet

June 6, 2006

## FOR YOUR INFORMATION MEMO

To: Mayor and Members of City Council

From: David E. Rager, City Manager *DRH*

Subject: **Kentucky Wastewater Treatment Plant Update**

Sanitation District No. 1 of Northern Kentucky (SD1) is currently building a wastewater treatment plant in northern Kentucky near Alexandria. The City of Cincinnati has taken the position that the new plant, the Eastern Regional Wastewater Treatment (ERWWTP), will dramatically improve the quality of Kentucky's streams, and we applaud the building of a plant in this area. However, the City of Cincinnati and its Greater Cincinnati Water Works (GCWW) continue to believe that the planned wastewater discharge from the ERWWTP, upstream of GCWW's Ohio River drinking water intakes, will have significant detrimental effects on the source of the region's drinking water.

Cincinnati City Council adopted a resolution objecting to the permit for this plant on November 26, 2003. Cincinnati opposed this permit due to the fact that the effluent discharge of the wastewater plant to the Ohio River would be located just eleven miles upstream of the GCWW Richard Miller Water Treatment Plant intake and two additional intakes serving the Northern Kentucky Water District. These drinking water plants provide water to approximately two million people who live and work in the Greater Cincinnati area.

GCWW has been joined in this effort by the Cincinnati Board of Health, the Hamilton County Board of Health, John Loper, PhD, and the Water Quality Advisory Committee of the University of Cincinnati. Community groups including the League of Women Voters, Sierra Club, and Alliance for Kentucky's Future, Inc. have submitted written comments and spoken in support of Cincinnati's efforts.

On June 7, 2004, the City of Cincinnati filed a Petition for Hearing with the Commonwealth of Kentucky Environmental and Public Protection Cabinet seeking to have them revoke the Kentucky Pollutant Discharge Elimination permit issued by the Kentucky Division of Water (DOW) which allows SD1 to proceed with its ERWWTP, or alternatively that the DOW be ordered to require SD1 to redesign its facility so that the water quality and uses of the Ohio River are protected.

In the fall of 2005, SD1 announced that it would relocate its ERWWTP discharge point from the Ohio River to a location on Brush Creek, a tributary to the Ohio River located in proximity to the ERWWTP, and also construct and operate certain plant upgrades. After exhaustive internal review and consultation with a variety of outside experts, GCWW has concluded that the proposed changes do not provide adequate protection. GCWW continues to advocate locating the effluent discharge to a point downstream from the GCWW and Northern Kentucky drinking water intakes. GCWW's most recent public statements objecting to the discharge permit are contained in a document titled "Comments by Greater Cincinnati Water Works on the State Planning and Environmental Assessment Report Issued by the Kentucky Division of Water on February 7, 2006 (Comments Filed April 5, 2006)." This and other related documents can be found at GCWW's internet web site [www.cincinnati-oh.gov/gcww](http://www.cincinnati-oh.gov/gcww) under "Features, Protecting GCWW's Source Water – The Ohio River".

GCWW continues to have many critical concerns that the proposed plant changes do not address, including the removal/inactivation of pathogens, contaminants such as synthetic organic chemicals and chlorinated solvents; endocrine disrupting compounds; contaminants with potential for future regulation; and plant upsets.

GCWW's conclusions are supported by cooperative river studies and modeling conducted by the United States Geological Survey and Dr. Forrest Holly, PhD, showing that the mixing of effluent discharge is not complete by the time the flow reaches the GCWW' intakes, and that the flow tends to be more concentrated toward the Kentucky side of the Ohio River where those drinking water intakes are permanently located.

In summary, GCWW believes that it just does not make sense to build a wastewater treatment plant, designed to protect the environment, and then discharge the wastewater effluent into tributaries of the Ohio River just eleven miles upstream from the intakes of the region's major drinking water treatment plants. Why create a problem that you know you will be addressing for years to come, when it is possible with proper planning to avoid the problem?

Further briefings and explanation of these issues are available to Council Committees and individual Council Members upon request.

Copy: Paul E. Tomes, Acting Director, Greater Cincinnati Water Works 